

REMARKS

Claims 1-12 are pending in this application. By this Amendment, claims 1, 4, 7, 8, 9 and 11 are amended. No new matter is added. Reconsideration of this application is respectfully requested.

Independent claims 1, 4, 7, 8, 9 and 11 have been amended to recite *inter alia* that "the protection circuit does not include a zener diode." Applicants respectfully submit that none of the references cited by the Office Action disclose, teach or suggest such a feature in combination with other features recited by the respective claims. Further, Applicants respectfully assert that incentive for including such a feature within a protective circuit and/or design of a protective circuit that includes such a feature would not have been obvious to one of ordinary skill in the art at the time of invention.

Support for claims 1, 4, 7, 8, 9 and 11 may be found throughout the original specification. For example, specific support for the feature identified above may be found in the original specification at: page 3, line 15, through page 4, line 1; page 13, lines 2-10; page 17, lines 1-9; page 20, line 24, through page 21, line 7; page 21, line 14, through page 22, line 4; page 23, lines 2-18; and page 24, lines 5-20.

I. Drawing Objection

The Office Action objects to Fig. 4 for not showing every feature recited in claim 8. Applicants have amended claim 8 for clarity purposes. Applicants respectfully submit that the objection is moot. Therefore, Applicants respectfully request that the Examiner withdraw the objection.

II. 35 U.S.C. §102(b) Rejection of Claims 1, 2, 4, 9 and 11

The Office Action rejects claims 1, 2, 4, 9 and 11 under 35 U.S.C. §102(b) as unpatentable over U.S. Patent No. 5,886,563 to Nasila ("Nasila"). This rejection is respectfully traversed.

Independent claims 1, 4, 9 and 11 have been amended to recite *inter alia* that "the protection circuit does not include a zener diode." Support for claims 1, 4, 9 and 11 may be found throughout the original specification, as described above.

Applicants respectfully submit that Nasila does not disclose, teach or suggest the combination of features recited by the respective claims. Accordingly, it is respectfully submitted that claims 1, 4, 9 and 11 are patentably distinguishable over the applied art. Claim 2 depends from independent claim 1 and, therefore, is likewise patentably distinguishable over the applied art for at least its dependence on an allowable base claim, as well as for additional features that it recites. Accordingly, withdrawal of this rejection is respectfully requested.

III. 35 U.S.C. §103(a) Rejection of Claims 10 and 12

The Office Action rejects claims 10 and 12 under 35 U.S.C. §103(a) as unpatentable over Nasila. This rejection is respectfully traversed.

Claim 12 recites *inter alia* that "the protection circuit does not include a zener diode." Claim 10 includes the same feature based upon its dependence upon claim 9, as discussed above. Applicants respectfully submits that Nasila does not disclose, teach or suggest the combination of features recited by the respective claims. Further, Applicants respectfully asserts that motivation for including such a feature within a protective circuit and an exemplary protective circuit embodiment that includes such a feature would not have been obvious to one of ordinary skill in the art at the time the invention was made.

For at least these reasons, it is respectfully submitted that independent 12 and dependent claim 10 are patentably distinguishable over the applied art. Withdrawal of the rejection is respectfully requested.

IV. 35 U.S.C. §103(a) Rejection of Claim 3

The Office Action rejects claim 3 under 35 U.S.C. §103(a) as unpatentable over Nasila in view of U.S. Patent No. 5,828,244 to Palera et al. ("Palera"). This rejection is respectfully traversed.

Claim 3 depends from independent claim 1 and, therefore, includes all the features of claim 1 including *inter alia* that "the protection circuit does not include a zener diode." For reasons stated above, Nasila fails to disclose, teach or suggest such a feature. Palera fails to overcome the above-described deficiency of Nasila with respect to dependent claim 3. Therefore, even if combined, Nasila and Palera would not have resulted in the combination of features recited in claim 3. Further, Applicants respectfully assert that motivation for including such a feature within a protective circuit and an exemplary protective circuit embodiment that includes such a feature would not have been obvious to one of ordinary skill in the art at the time the invention was made.

For at least these reasons, it is respectfully submitted that independent claim 3 is patentably distinguishable over the applied art. Withdrawal of the rejection is respectfully requested.

V. 35 U.S.C. §103(a) Rejection of Claims 5, 7 and 8

The Office Action rejects claims 5, 7 and 8 under 35 U.S.C. §103(a) as unpatentable over Nasila in view of U.S. Patent No. 5,886,563 to Kitagawa et al. ("Kitagawa"). This rejection is respectfully traversed.

Independent claims 7 and 8 recite *inter alia* that "the protection circuit does not include a zener diode." Claim 5 includes the same feature based upon its dependence upon claim 4, described above. For reasons stated above, Nasila fails to disclose, teach or suggest such a feature. Kitagawa fails to overcome the above-described deficiency of Nasila.

Therefore, even if combined, Nasila and Kitagawa would not have resulted in the combination of features recited in the respective claims. Further, Applicants respectfully assert that motivation for including such a feature within a protective circuit and an exemplary protective circuit embodiment that includes such a feature would not have been obvious to one of ordinary skill in the art at the time the invention was made.

For at least these reasons, it is respectfully submitted that independent claims 5, 7 and 8 are patentably distinguishable over the applied art. Withdrawal of the rejection is respectfully requested.

VI. 35 U.S.C. §103(a) Rejection of Claim 6

The Office Action rejects claim 6 under 35 U.S.C. §103(a) as unpatentable over Nasila in view of Palera and Kitagawa. This rejection is respectfully traversed.

Claim 6 depends from independent claim 4 and, therefore, includes all the features of claim 4 including *inter alia* the feature "wherein the protection circuit does not include a zener diode." For reasons stated above, Nasila fails to disclose, teach or suggest such a feature. Both Palera and Kitagawa fail to overcome the above-described deficiency of Nasila with respect to dependent claim 6. Therefore, even if combined, Nasila, Palera and Kitagawa would not have resulted in the combination of features recited in claim 6. Further, Applicants respectfully assert that motivation for including such a feature within a protective circuit and an exemplary protective circuit embodiment that includes such a feature would not have been obvious to one of ordinary skill in the art at the time the invention was made.

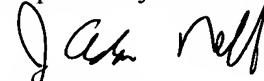
For at least these reasons, it is respectfully submitted that independent claim 6 is patentably distinguishable over the applied art. Withdrawal of the rejection is respectfully requested.

VII. Conclusion

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-12 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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Date: December 17, 2004

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Amendments to the Drawings:

The attached replacement drawing sheet makes changes to Figs. 6 and 7 and replaces the original sheet with Figs. 6 and 7.

Attachment: Replacement Sheets